

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

CITY OF SOUTH BEND, BY ITS)
CORPORATION COUNSEL)
ALADEAN M. DEROSE)

Plaintiff,)

v.)

CASE NO: 3:12 CV 475

UNITED STATES OF AMERICA,)
ERIC H. HOLDER, JR., IN HIS)
OFFICIAL CAPACITY AS ATTORNEY)
GENERAL OF THE UNITED STATES,)
SOUTH BEND COMMON COUNCIL,)
TIM CORBETT, DAVE WELLS, STEVE)
RICHMOND, BRIAN YOUNG and)
SANDY YOUNG,)

Defendants.)

**DEFENDANTS' TIM CORBETT, DAVE WELLS, STEVE RICHMOND,
BRIAN YOUNG AND SANDY YOUNG'S ANSWER TO
PLAINTIFF'S COMPLAINT FOR DECLARATORY JUDGMENT**

Come now the defendants, Tim Corbett, Dave Wells, Steve Richmond, Brian Young and Sandy Young, by counsel, Daniel H. Pfeifer and Jeffrey J. Stesiak, and for their Answer to Plaintiff's Complaint for Declaratory Judgment, state the following:

1. That as to rhetorical paragraph no. 1, defendants admit the allegations contained therein.

2. That as to rhetorical paragraph no. 2, defendants admit the allegations contained therein.

3. That as to rhetorical paragraph no. 3, defendants admit the allegations contained therein.

4. That as to rhetorical paragraph no. 4, defendants admit the allegations contained therein.

5. That as to rhetorical paragraph no. 5, defendants admit the allegations contained therein.

6. That as to rhetorical paragraph no. 6, defendants admit the allegations contained therein.

7. That as to rhetorical paragraph no. 7, defendants admit the allegations contained therein.

8. That as to rhetorical paragraph no. 8, defendants admit the allegations contained therein.

9. That as to rhetorical paragraph no. 9, defendants admit the allegations contained therein.

10. That as to rhetorical paragraph no. 10, defendants admit the allegations contained therein.

11. That as to rhetorical paragraph no. 11, defendants admit the allegations contained therein.

12. That as to rhetorical paragraph no. 12, defendants admit the allegations contained therein.

13. That as to rhetorical paragraph no. 13, defendants admit the allegations contained therein.

14. That as to rhetorical paragraph no. 14, defendants admit the allegations contained therein.

15. That as to rhetorical paragraph no. 15, defendants admit the allegations contained therein.

16. That as to rhetorical paragraph no. 16, defendants admit the allegations contained therein.

17. That as to rhetorical paragraph no. 17, defendants admit the allegations contained therein.

18. That as to rhetorical paragraph no. 18, defendants admit the allegations contained therein.

19. That as to rhetorical paragraph no. 19, defendants admit the allegations contained therein.

20. That as to rhetorical paragraph no. 20, defendants admit the allegations contained therein.

21. That as to rhetorical paragraph no. 21, defendants admit the allegations contained therein.

WHEREFORE, defendants pray that plaintiff take nothing by way of its Complaint, together with the costs of this action and for all other just and proper relief.

/s/ Daniel H. Pfeifer

Daniel H. Pfeifer (5720-71)

Jeffrey J. Stesiak (16876-46)

Attorneys for Tim Corbett, Dave Wells,

Steve Richmond, Brian Young & Sandy Young

PFEIFER MORGAN & STESIAK

53600 N. Ironwood Drive

South Bend, IN 46635

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the above and foregoing was served by electronic mail this 20th day of September upon: Edwards Sullivan, J.P. Hanlon, *Faegre Baker Daniels, LLP*, 202 S. Michigan Street, Ste. 1400, South Bend, IN 46601; Aladean DeRose, *City of South Bend*, 227 W. Jefferson Blvd., Ste. 1400, South Bend, IN 46601.

/s/ Daniel H. Pfeifer

Daniel H. Pfeifer